UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v. C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

MOTION TO FILE INSTANTER

Plaintiffs respectfully move to file instanter their reply in further support of their motion to compel, dkt. # 583. In support of their motion, Plaintiffs state as follows:

- 1. In light of the heavy briefing schedule, yesterday's deadline to file pre-hearing motions, preparation for a deposition tomorrow in Israel, and preparation of a response to the Insurance and Pension Fund's appeal of Judge Lagueux's denial of its motion to vacate, Plaintiffs were unable to file their reply brief yesterday.
- Additionally, a significant focus of the reply memorandum is the declaration of Dr. Itay Lipschits, a professor of Israeli civil procedure at several Israeli law schools.
- 3. Counsel only received Dr. Lipschits' declaration from Israel late yesterday afternoon and accordingly was unable to complete Plaintiffs' reply by midnight November 29, 2010.

- 4. In order to avoid further delay, Plaintiffs' filed their reply memorandum at approximately 9:02 am this morning.
- 5. Plaintiffs respectfully suggest the filing of their reply memorandum this morning will not unduly burden or inconvenience the Court or opposing counsel.

WHEREFORE, the instant motion should be granted.

Dated November 30, 2010

Plaintiffs by their Attorneys,

/s/ David J. Strachman
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CERTIFICATION

I hereby certify that on November 30, 2010 I filed this motion via ECF which served the following counsel of record:

Deming E. Sherman Edwards Angell Palmer & Dodge LLP 2800 Bank Boston Plaza Providence, RI 02903

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/S/ David J. Strachman